

# Exhibit “C”

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**Michael Murphy**

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**From:** Michael Murphy  
**Sent:** Tuesday, August 27, 2024 8:39 AM  
**To:** Zachary Hansen; Michael Murphy, Jr.  
**Cc:** Bryan Sullivan; Salvaty, Paul B.; gaellis@winston.com;  
AbbeLowellPublicOutreach@winston.com; Robie Atienza-Jones  
**Subject:** RE: Biden v. Byrne (2:23-cv-09430) - Meet and Confer Letter

Zachary:

In my e-mail to you of August 20, 2024, I requested that you provide me with some times for yesterday afternoon when we could speak regarding all discovery issues in that I would be back in the office yesterday. You never contacted me to schedule the requested telephone call for yesterday afternoon. Instead, you sent me some further discovery responses, a further rule 26f disclosure which is still deficient, and a further production of some additional documents.

I renew my request that you comply with the code and provide me with some dates and times when we can meet and confer to discuss all discovery issues between us. I look forward to receiving those proposed dates and times from you.

Very truly yours,

Michael C. Murphy, Esq.

**From:** Zachary Hansen <zhanzen@earlysullivan.com>  
**Sent:** Tuesday, August 27, 2024 7:31 AM  
**To:** Michael Murphy <michael@murphlaw.net>; Michael Murphy, Jr. <michael.jr@murphlaw.net>  
**Cc:** Bryan Sullivan <bsullivan@earlysullivan.com>; Salvaty, Paul B. <PSalvaty@winston.com>; gaellis@winston.com;  
AbbeLowellPublicOutreach@winston.com; Robie Atienza-Jones <rjones@earlysullivan.com>  
**Subject:** RE: Biden v. Byrne (2:23-cv-09430) - Meet and Confer Letter  
**Importance:** High

Michael,

The Stipulated Protective Order was entered by the Court on Friday and pursuant to your August 19<sup>th</sup> meet and confer letters, Plaintiff produced amended discovery responses and a supplemental document production of confidential records yesterday by the deadline set by your office. Defendant, however, failed to serve any further amended responses or any further documents subject to the protective order yesterday, as demanded in our August 19<sup>th</sup> meet and confer letter.

As such, Plaintiff will schedule an Informal Discovery Conference with Magistrate Judge Donahue to cover the issues set forth in Plaintiff's August 19<sup>th</sup> meet and confer letter before filing a motion to compel. At your earliest convenience please provide three dates that Defense counsel is available next week for an IDC on these issues and include Defendant's three-sentence IDC statement, as required by Magistrate Judge Donahue's standing order. I will then email Judge Donahue's chambers to schedule the IDC.